

EXHIBIT 13

MAY 11 1982

Mr. Joseph A. Bosco
Bosco & Curry
Attorneys-at-Law
1220 Nineteenth Street, N.W.
Washington, D.C. 20036

Dear Mr. Bosco:

This is in response to your December 24, 1981 letter, requesting that the Small Business Administration make a determination that women are a "socially disadvantaged" group pursuant to Section 8(a)(5) of the Small Business Act, as amended (15 U.S.C. § 637(a)(5)) and 13 C.F.R. § 124.1-1(C)(3)(iv).

After careful consideration of your request, and a study of Pub. L. 95-507 and its legislative history, your request is denied.

An analysis by our Office of General Counsel of Pub. L. 95-507 and its legislative background concludes that women business owners may not qualify as a presumptively "socially disadvantaged" group, pursuant to 13 C.F.R. § 124.1-1(C)(3)(iv). This is based upon our findings that presumptive group "social disadvantage" is primarily intended for the traditional "minority" groups and should not be extended to the broader class of "women." (e.g., H.R. Rep. No. 95-949, 95th Cong., 2d Sess., 1978; H. Conf. Rep. No. 95-1714, 95th Cong., 2d Sess., 1978; 11 Weekly Comp. of Pres. Doc. 1848-49, Oct. 25, 1978).

As you know, however, a business owned, controlled and managed by women might qualify as "socially disadvantaged" on an individual basis pursuant to 13 C.F.R. § 124.1-1(C)(3)(iii).

Your interest in SBA's 8(a) program is appreciated.

Sincerely,

/S/ James C. Sanders

James C. Sanders
Administrator